

1 Tina Wolfson (SBN 174806)  
2 Robert Ahoot (SBN 172098)  
3 Theodore W. Maya (SBN 223242)  
4 Rachel R. Johnson (SBN 331351)  
4 **AHDOOT & WOLFSON, PC**  
5 2600 West Olive Avenue, Suite 500  
5 Burbank, CA 91505  
6 Tel: (310) 474-9111  
7 Fax: (310) 474-8585  
8 twolfson@ahdootwolfson.com  
9 rahdoot@ahdootwolfson.com  
9 tmaya@ahdootwolfson.com  
10 rjohnson@ahdootwolfson.com

11 *Counsel for Plaintiff and the Proposed Class*

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13 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14

15 MAXIMILIAN KLEIN and SARAH  
15 GRABERT, individually and on behalf of all  
16 others similarly situated,

Case no.: 5:20-cv-08570-LHK

17 Plaintiffs,

18 v.

19 FACEBOOK, INC., a Delaware corporation  
19 headquartered in California,

20 Defendant.

21 VICKIE SHERMAN, LEZAH NEVILLE-  
21 MARRS, KATHERINE LOOPERS, and  
22 JARRED JOHNSON, individually and on  
22 behalf of all others similarly situated,

Case no.: 3:20-cv-08721-LB

23 Plaintiffs,

24 v.

25 FACEBOOK, INC., a Delaware corporation  
25 headquartered in California,

26 Defendant.

27  
28 **DECLARATION OF TINA WOLFSON IN  
28 SUPPORT OF ADMINISTRATIVE  
MOTION TO RELATE CASES**

1 I, Tina Wolfson, make the following declaration pursuant to 28 U.S.C. § 1746:

2 1. I make this declaration upon personal knowledge and am competent to testify to  
3 the facts set forth herein.

4 2. I am a partner with the law firm Ahdoot & Wolfson PC and counsel for the Plaintiffs  
5 Vickie Sherman, Lezah Neville-Marrs, Katherine Loopers, and Jarred Johnson in *Sherman et*  
6 *al v. Facebook, Inc.*, No. 3:20-cv-08721-LB, filed in this District on December 9, 2020.

7 3. I submit this Declaration in support of Plaintiffs' Administrative Motion on to Relate  
8 Cases.

9 4. Civil Local Rule 3-12 requires that this Administrative Motion to Relate Cases be  
10 promptly filed. No counsel has yet formally appeared for Facebook, Inc. in either the *Klein*  
11 or the *Sherman* action. Thus a stipulation could not be obtained with Facebook's official  
12 counsel of record prior to filing of the Administrative Motion. However, Plaintiffs met and  
13 conferred with counsel representing Facebook in *Reveal Chat Holdco LLC, et al., v. Facebook,*  
14 *Inc.*, 5:20-cv-00363-BLF on December 16, 2020. Counsel for Facebook in *Reveal Chat* stated  
15 they did not know if they would be representing Facebook in the *Klein* and *Sherman* actions,  
16 but requested that Plaintiffs state Facebook's position as follows: "Facebook agrees that the  
17 *Sherman* and *Klein* cases meet the standard for related cases in Local Civil Rule 3-12, but  
18 believes that both cases are also related to a previously filed case pending before Judge  
19 Freeman: *Reveal Chat et al v. Facebook, Inc.*, No. 20-cv-00363-BLF. Consistent with the Local  
20 Rules, Facebook has already filed before Judge Freeman motions to relate both the *Klein* and  
21 *Sherman* cases with *Reveal Chat* and therefore respectfully requests that the court not rule on  
22 this motion until Judge Freeman has a chance to decide those motions." Plaintiffs in *Klein*  
23 have opposed Facebook's Motion For Administrative Relief To Consider Whether Cases  
24 Should Be Related Pursuant To Civil L.R. 3-12 filed by Facebook in *Reveal Chat*. Plaintiffs  
25 in *Sherman* are similarly opposing motions to relate to *Reveal Chat*.

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

3 EXECUTED this 21 December 2020.

4 /s/ Tina Wolfson.

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